



George Latimer
County Executive

John M. Nonna
County Attorney

May 22, 2024

VIA ECF

Hon. Vincent L. Briccetti
U.S. District Court, Southern District of New York
Charles L. Briant Jr. Federal Building & Courthouse
300 Quarropas Street, Courtroom 630
White Plains, New York 10601

Re: *White Plains Aviation Partners, LLC, d/b/a Million Air White Plains v. County of Westchester*, No. 21 Civ. 5312 (VB)

Dear Judge Briccetti:

The County of Westchester and White Plains Aviation Partners, LLC, d/b/a Million Air White Plains ("Million Air"), write jointly pursuant to Your Honor's Order, dated May 1, 2024 (ECF No. 98), to update the Court regarding the status of their settlement discussions.

Since their last joint status submission on May 1, 2024 (ECF No. 97), the parties have continued to engage in settlement discussions and are nearing the completion of negotiations as to the terms of an interim settlement agreement that would remove this case from the Court's docket pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Accordingly, the parties respectfully request a continued stay of the litigation while they focus their efforts on negotiating and finalizing these settlement terms. If the stay is extended, the parties propose that they update the Court as to the status of their continued negotiations on or before May 31, 2024.

The parties thank the Court for its consideration of their request.

Respectfully submitted,

/s/ Ross E. Morrison
YANKWITT LLP
Russell M. Yankwitt
Ross E. Morrison
140 Grand Street, Suite 705
White Plains, New York 10601
Counsel for Plaintiff

/s/ John M. Nonna
JOHN M. NONNA
Westchester County Attorney
John M. Nonna
Sean Carey
Shawna C. MacLeod
Counsel for Defendant County